

EAG:MKM
F.#2012R00178

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12- 211

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UNITED STATES OF AMERICA

- against -

RONALD HINES,
also known as "Black,"

Defendant.

TO BE FILED UNDER SEAL

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF AN ARREST
WARRANT

(T. 18, U.S.C.,
§ 922(a)(1)(A))

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS KALOGIROS, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between January 24, 2011 and November 21, 2011, both dates being approximate and inclusive, within the Eastern District of New York, the defendant RONALD HINES, also known as "Black," not being a licensed importer, manufacturer, or dealer in firearms, did knowingly and willfully engage in the business of dealing in firearms.

(Title 18, United States Code, Section 922(a)(1)(A).)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I have been a Special Agent with ATF for approximately four-and-a-half years. In this capacity, I am assigned to investigate firearm trafficking in the New York metropolitan area and elsewhere. The information set forth in this complaint is based on my own observations, interviews with law enforcement officers, interviews with a confidential source (the "CS"), review of records of the ATF, and debriefings of other witnesses. Conversations and statements set forth in this complaint are set forth in sum and substance and in part.

2. On or about January 24, 2011, members of the ATF Joint Firearms Task Force ("JFTF") received information from the CS that an individual known as "Black" was offering for sale a sawed-off shotgun for \$250. At approximately 9:15 p.m. on or about January 24, 2011, an undercover JFTF Agent (the "U/C") and the CS drove to the vicinity of 1196 Jefferson Avenue, Brooklyn, New York in an unmarked police vehicle. Shortly after arriving, "Black" approached the unmarked police vehicle and indicated that he did not want to bring the gun to the car. The U/C and the CS got out of the car and purchased from "Black" for \$250 a sawed-off Mossberg, model 88, 12-gauge shotgun, with serial number MV74152L.

^{1/} Because the purpose of this affidavit is to establish only probable cause to obtain an arrest warrant, I have not set forth a description of all the facts and circumstances of which I am aware.

3. By reviewing photographs of individuals residing in the vicinity of 1196 Jefferson Avenue, Brooklyn, New York, the U/C positively identified "Black" as the defendant RONALD HINES who lived at a residence on Jefferson Avenue in Brooklyn, New York (the "Jefferson Residence").

4. On or about November 1, 2011, members of the JFTF received information from the CS that HINES was offering for sale a shotgun for \$200. At approximately 4:00 p.m. ~~on or about~~ November 1, 2011, the U/C and the ~~CS~~ drove to the vicinity of the Jefferson Residence in an unmarked police vehicle, where they met the defendant RONALD HINES. After an initial discussion, HINES left to retrieve the firearm. When he returned, he got into the backseat of the unmarked police vehicle and sold the U/C a Mossberg, model 200, 12-gauge shotgun, serial number 57568, and three shotgun shells for \$200.


5. On or about November 21, 2011, members of the JFTF received information from the CS that HINES was offering for sale two handguns. At approximately 4:00 p.m. on or about November 21, 2011, the U/C and the CS drove to the vicinity of the Jefferson Residence in an unmarked police vehicle. When they arrived, HINES greeted the U/C and the CS, and then entered the vehicle. HINES then sold the U/C for \$550: one Hipoint model C9, 9 mm pistol with a defaced serial number; one H&R model 732, .32 caliber revolver, with serial number AM24184; and eleven rounds of ammunition.

6. I have reviewed ATF records and have confirmed that the defendant RONALD HINES is not a licensed importer, licensed manufacturer, licensed dealer or licensed collector of firearms. In fact, a criminal records check revealed that HINES is a convicted felon and therefore cannot legally deal in, or even possess, firearms. Specifically, HINES was convicted on August 22, 1986 of criminal sale of a controlled substance in the third degree, in violation Section 220.39(1) of the New York State Penal Law, a felony, and was sentenced to a term of imprisonment of 1 to 3 years. HINES also was convicted on May 25, 1989 of attempted criminal possession of a weapon in the third degree, in violation of Section 265.02 of the New York State Penal Law, a felony, and was sentenced to a term of imprisonment of 18 months to 3 years.

7. I have consulted with an ATF interstate nexus expert and determined that none of the above-mentioned firearms were manufactured in New York State.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant RONALD HINES, also known as "Black," so that he may be dealt with according to law. Because this investigation is ongoing, and in light of the nature of this Complaint and Affidavit, it is further respectfully

requested that this Complaint and Affidavit and any Order issued thereon be ordered sealed until further notice.



THOMAS KALOGIROS
Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me this
29th day of February, 2012

/THE HON. ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK